

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue Seattle, Washington 98101

February 9, 1993

Reply To

Attn of: HW-117 CR

Lena Schaye
The Marasco Newton Group, Ltd.
1600 Wilson Blvd. Suite 1200
Arlington, VA 22209



Dear Ms. Schaye:

Thank you for the opportunity to review this story. Overall, it covers the issues of the site very well. I would like to see the focus of the story shifted more onto the involvement of the community throughout the process and the important role they played in getting action to address the problems. Without the on-going "push" from the community this site could have dragged on longer. The remainder of this memo addresses concerns with the story as it is written.

There is one over-arching concern that needs serious consideration and that is the use of the word "polluters". The parties who disposed of chemicals and the County, who owned and operated the landfill, handled the chemicals in an acceptable manner at the time. Therefore, calling them polluters could cause political ramifications that neither the Project Manager or myself should have to handle. The term Potentially Responsible Parties, although it is jargon, would be a more accurate term for describing all parties involved in this site, unless you have another suggestion.

Page 1, 1st bullet: The term Polluters should be changed throughout the story.

Page 2, 1st paragraph: Capitalize "although" in third sentence. Also there needs to be an additional sentence "The site also includes the contaminated groundwater plumes."

Page 2, 2nd paragraph: The second sentence should "...in open disposal trenches..." Add to end of last sentence "and the landfill stopped receiving refuse."

Page 3, 2nd paragraph: The 4th sentence should read "...the Spokane County Health District .... not to drink from

- contaminated wells. (Not all wells in the area were contaminated)
  The 5th sentence should read ...the residents began obtaining
  bottled water...
- Page 4, 1st paragraph: Please insert "Inc." after the name Keytronic throughout the story. The last sentence does not agree with 5th sentence in next paragraph regarding date of when County and Keytronic, Inc. began providing bottled water.
- Page 4, 2nd paragraph: Change 2nd through 4th sentences to read: "First, EPA negotiated with the County and other PRPs to begin a preliminary intensive investigation into the nature and extent of the site contamination. Second, while Spokane County was conducting this preliminary investigation Ecology began the Superfund Remedial Investigation to avoid delays in the cleanup process. In 1984, EPA provided Superfund money to Ecology ...of the contamination (as part of the Remedial Investigation) at the site...".
- Page 5, 3rd paragraph: Second sentence should read..."The County tested a pilot extraction system in three areas of the site into the groundwater plume to test...". The 4th sentence uses the word "strips" to define what happens in an air stripping tower. I would suggest another word, such as removes or releases.
- Page 6, 1st sentence: It should read "....organics disperse and can biodegrade.
- Page 6, 1st paragraph: In the 2nd sentence.. "The wells are tested four times a year.
- Page 6, 2nd paragraph: In the 1st sentence, define "it" as "the project". The 4th sentence should read: " As the County decided on the potential location of the extraction wells, 3 test wells were installed."
- Page 6, Section called Easing Community Concerns: I believe this section should be placed closer to the front of the story. It was through the perseverance of the community many of the issues were addressed early.
- Page 7, 2nd paragraph: In the 2nd sentence is should read: " The residents of the Colbert area...".
- Page 7, 3rd paragraph: The 3rd sentence should read "...about the actions planned for the site...".
- Page 7, Decked quote: I would suggest focusing on the residents working with the agencies throughout this long process, not the surprise in the contamination as your quote indicates. Granted, the citizens were surprised, but then took immediate and very active role in getting the problems fixed.

Page 8, 1st paragraph: In the last sentence, reference to the non-settlers should also be made in the beginning when you first discuss PRPs.

Page 8, 2nd paragraph: This paragraph may be more effective in bullet form.

Page 9, 2nd paragraph: Add another sentence-"Both citizens remain active in the cleanup work."

Page 9, decked quote: Change to read "....being on work groups, holding community meetings, and participating in public meetings..."

Page 9, blocked question: It may take decades to cleanup the groundwater contamination.

Page 10, Simplified Timeline: '85--change EPA to County

Page 11, Simplified Timeline: '94==Change to read: Protective cover designed and ready for construction.

Should you have any questions about our comments, please feel free to call me at (206) 553-1283.

Sincerely

Grechen F. Schmidt

Community Relations Coordinator

cc: Neil Thompson, HW-113